

Submission on the Review of the Container Deposit Scheme Minimum Network Standards Third Review

October 2022

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission therefore represents the consolidated view of Western Australia Local Government. However, individual Local Governments and Regional Councils may have views that differ from the positions taken here.

Due to the timeframe for consultation, this Submission has not yet been considered by MWAC. It will be put before the Council at the upcoming meeting on Wednesday, 26 October 2022. The Department will be informed of any changes to this Submission following consideration by MWAC.

Introduction

The Western Australian Local Government Association (the Association) welcomes the opportunity to comment on the Third Review of the *Container Deposit Scheme Minimum Network Standards*. In contributing to the development of the Scheme, the Association made [comment](#) on the Customer Service Standards which informed the Minimum Network Standards. WALGA acknowledges that many of the recommendations made in this Submission have been included, such as the increase in allocation of refund points within the metropolitan area. In October 2021, the Association made a Submission on the first Review of the CDS Minimum Network Standards.

The Container Deposit Scheme (CDS) was established under the *Waste Avoidance and Resource Recovery Act 2007* on 1 October 2020. As part of the regulations, the Minimum Network Standards are to be reviewed as soon as practicable after the six-month anniversary of the Scheme commencing and after that, at intervals of not more than six months for the first three years.

As part of the Scheme a scheduled review process was included for the Minimum Network Standards. The first review occurred in October 2021 focusing on community perception of the Scheme, definitions of flexible refund points with the second review in January 2022 focusing on issues in relation to the structure of the collection network, particularly the economic viability of refund points that opened for shorter hours than the specified standards.

The third review identifies the following key points:

- Refund points below 500-person population threshold
- Refund points above 500-person population threshold

This Submission comments on the key points which have been identified as part of the Third Review process.

Key Issue Identified	Options - To address these issues are as follows:					
Refund points above and below 500-person population threshold	1. Remove requirement for minimum operating hours for refund points servicing less than 500 people	2. Increased handling fee	3. Additional services refund point agreement	4. WARRRL to consider providing grants for fabrication of bag drop infrastructure or retain ownership and loan bag drop infrastructure to assist refund points meet minimum operating hours where economic viability is considered a key factor.	5. Temporary exemption for a period of two years for specific refund points from meeting minimum operating hours	6. Increased non-financial support. WARRL provide support through business development, process review and enhancement to reduce unnecessary costs.
WALGA Comment	<ol style="list-style-type: none"> 1. Do not support. Removing the requirement entirely does not support or guarantee community access. 2. Further investigation required: If refund points are not viable with the current handling fee, considerations should be given to increasing the fee. 3. Support: The extra processing on site increases the efficiency of the Scheme and provides local employment. 4. Partial support: Bag drop facilities are not suitable for all locations and should only be provided in areas where there is an enclosed site. Security may need to be provided at some sites which would be prohibitive to establishing a bag drop site. Also, there is strong community sentiment, as indicated in the survey results which were part of the second review, for cash refunds. 5. Partial Support: As per the WALGA Submission on the Customer Service Standard, it is recommended <ol style="list-style-type: none"> 1. That refund point operators are provided with an opportunity to propose an alternate approach to the DWER that delivers the outcomes sought through the specified minimum service standards on the minimum level and type of service provided at refund points. 2. That the DWER assesses and approves any proposed reduction in services, in consultation with the local community. 3. That the Scheme Coordinator is required to provide the baseline level and type of service specified by Government, where no parties express an interest in operating a refund point. 6. Support: This could potentially benefit refund points in regional and remote areas. 					